1271 Avenue of the Americas New York, New York 10020-1401

Milan

Tel: +1.212.906.1200 Fax: +1.212.751.4864 www.lw.com

FIRM / AFFILIATE OFFICES

Austin Beijing Boston New York

Brussels Orange County Century City Paris Riyadh Chicago Dubai San Diego Düsseldorf San Francisco Frankfurt Seoul Hamburg Silicon Valley Hong Kong Singapore Tel Aviv Houston London Tokyo

Washington, D.C. Los Angeles

Madrid

LATHAM & WATKINS LLP

October 15, 2024

VIA ECF

Hon. Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street, Courtroom 23A New York, New York 10007

> Re: The Center for Investigative Reporting, Inc. v. OpenAI, Inc., et al. Case No. 24-cv-04872-SHS-OTW - Oral Argument Request

Dear Judge Stein:

On behalf of Defendants OpenAI, Inc., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, L.L.C., OpenAI Global, L.L.C., OAI Corporation, L.L.C., and OpenAI Holdings, L.L.C. (together, the "OpenAI Defendants"), we write pursuant to Rule 2.F of Your Honor's Individual Practices to request that oral argument be held with respect to the OpenAI Defendants' Motion to Dismiss Amended Complaint.

Thank you for your consideration.

Respectfully submitted,

/s/ Andrew M. Gass

Andrew M. Gass (pro hac vice) of LATHAM & WATKINS LLP

All Counsel of Record (via ECF) cc: